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15 Attorneys for Plaintiff,
16 Gerald McGhee

17 **UNITED STATES DISTRICT COURT**
18 **SOUTHERN DISTRICT OF CALIFORNIA**

19 GERALD MCGHEE, an individual,

20 Plaintiff,

21 vs.

22 I.C. SYSTEM, INC.

23 Defendant.

24 Case No.: 13CV0909- MMA-MDD

25 **NOTICE OF PLAINTIFF'S**
26 **MOTION AND MEMORANDUM**
27 **IN SUPPORT OF MOTION FOR**
28 **AN AWARD OF ATTORNEY'S**
FEES AND COSTS

DATE: August 5, 2013

TIME: 2:30PM

DEPT.: 3A

JUDGE: Hon. Michael M. Anello

PLAINTIFF'S NOTICE OF MOTION AND MEMORANDUM IN SUPPORT OF AN AWARD OF
ATTORNEYS' FEES AND COSTS

1 **TO: DEFENDANT ABOVE NAMED AND THEIR ATTORNEY OF**
2 **RECORD:**

3 **PLEASE TAKE NOTICE** that on August 5, 2013 at 2:30 p.m. or as
4 soon thereafter as counsel may be heard in Courtroom 3A of the above
5 entitled Court, Plaintiff will, and hereby does, move the court for an award
6 of attorney's fees and litigation expenses pursuant to 15 U.S.C 1692 *et seq*
7 and California Civil Code section 1788 *et seq*. The total requested is
8 \$23,622.50.

9 This motion is made on the ground that Plaintiff is the prevailing party
10 in this litigation following an offer of judgment that has been entered against
11 Defendant I.C. System, Inc. and that an award of attorney's fees and
12 litigation expenses is mandated by statute under 15 U.S.C 1692 *et seq* and
13 California Civil Code section 1788 *et seq*, and pursuant to the terms of the
14 offer of judgment.

15 This motion is based on this Notice of Motion, the attached
16 Memorandum of Points and Authorities, the declarations and exhibits filed
17 herewith and such other materials to be considered by the court at the time
18 of the hearing on this motion.

19
20 Dated: July 5, 2013

LAGUARDIA LAW

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22 By: s/Eric A. LaGuardia
23 ERIC A. LAGUARDIA
24 And for:
25 Andre L. Verdun
26 Attorneys for Plaintiff,
27 Gerald McGhee
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